

Attachment 5

TRAINING PLAN

[6 CCR 1007-3 § 100.41(a)(12) and § 264.16]

This hazardous waste training program provides Pueblo Chemical Depot (PCD) personnel with the necessary knowledge and skills to perform hazardous waste duties at the Resource Conservation and Recovery Act (RCRA) permitted storage units safely and efficiently, and ensures that hazardous activities at the permitted units are conducted in an environmentally sound manner. This section describes the training requirements and implementation for PCD employees and contractors who are responsible for hazardous waste operations at the RCRA permitted hazardous waste management units described in this Permit.

The purpose of the training program is to prepare PCD personnel, who work at the permitted hazardous waste management units, for mission responsibility with emphasis on reducing potential risks that may threaten human health or the environment. This is accomplished by ensuring that personnel managing or handling hazardous waste are thoroughly familiar with, and can properly perform, their assigned duties and responsibilities. In addition to providing training in the hazards specific to their work sites, the training program provides personnel with an understanding of necessary methods to manage and respond to hazardous materials and waste issues at the permitted hazardous waste management units, including safety, environmental, and emergency response operations.

In general, PCD training meets the requirements of 40 CFR § 270.14(a)(12) and 264.16; and Colorado Hazardous Waste Regulations, 6 CCR 1007-3 § 100.41(a)(12) and § 264.16 by:

- Providing both initial and continuing training specific to hazardous waste management positions associated with the RCRA permitted hazardous waste management units
- Ensuring personnel do not engage in waste management operations at the permitted units until they have completed the requisite health and safety training [Occupational Safety and Health Administration (OSHA) 29 CFR 1910.120 (Hazardous Waste Operations and Emergency Response {HAZWOPER}); and OSHA 29 CFR 1910.1200 (hazard communications {HAZCOM})]

- Ensuring personnel complete their training program within 6 months of their assignment associated with the PCD RCRA permitted hazardous waste management units or to a new position within PCD associated with the permitted hazardous waste management units.
- Ensuring personnel do not work unsupervised at their work site(s) at the permitted units until they have obtained all required training for a particular hazardous waste management position for the permitted units
- Ensuring the training program is directed by qualified personnel trained in hazardous waste management procedures (including Contingency Plan content and implementation)
- Providing training that enables PCD personnel to respond effectively to emergencies by familiarizing them with facility-specific emergency procedures, emergency equipment, and emergency systems including but not limited to:
 - Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
 - Communications and alarm systems;
 - Response to fires or explosions;
 - Response to groundwater contamination incidents;
 - Shutdown of operations; and
 - Facility Contingency Plan
- Providing annual and periodic reviews of applicable training and ensuring PCD personnel participation
- Maintaining required training records and documentation.

The training program comprised of HAZCOM, HAZWOPER, RCRA, and refresher training components, provides both initial and continuing training relevant to an employee's position and applies to personnel who manage hazardous waste at the RCRA permitted hazardous waste management units, including but not limited to, personnel who handle, move, perform maintenance on, and operate hazardous waste management equipment or supervise those who do at the PCD RCRA permitted hazardous waste management units.

- 1 Section 5-1 describes training program requirements specific to personnel who work at or otherwise
- 2 manage hazardous waste at the RCRA permitted hazardous waste management units. Section 5-2
- 3 describes implementation of the training program for personnel who work at the RCRA permitted
- 4 hazardous waste management units.

5-1 OUTLINE OF TRAINING PROGRAM [6 CCR 1007-3 § 100.41(a)(12) and § 264.16(a)(1)]
and **TRAINING CONTENT, FREQUENCY, AND TECHNIQUES** [6 CCR 1007-3
§ 264.16(a)(3), (c), and (d)(3)]

Training consists of both introductory and continuing training for supervisors, operators, maintenance personnel, and other personnel involved in PCD waste management operations at the RCRA permitted hazardous waste management units. Introductory training includes classroom and hands-on training consisting of equipment operation and hands-on experience with hazardous waste procedures and instruction in emergency response. Continuing training includes safety briefings, procedure reviews, and annual refresher courses. The training for PCD personnel incorporates training required by RCRA, OSHA, and the U.S. Army. This training includes HAZCOM, HAZWOPER, RCRA, and Refresher training components. All PCD personnel receive training on the PCD emergency response procedures, including evacuation protocol, through the required Active Shooter training.

5-1a HAZCOM Training

In general, all PCD employees or contractors who work at the RCRA permitted hazardous waste management units receive HAZCOM training (per 29 CFR 1910.1200). Initially, general HAZCOM training is provided by the PCD Training Office. Job-specific training requirements at the RCRA permitted hazardous waste management units are provided by the employee's supervisor. The HAZCOM course description is provided in **Appendix 5-2**.

5-1b HAZWOPER Training

In addition to HAZCOM training, PCD personnel who work at the RCRA permitted hazardous waste management units receive HAZWOPER training (per 29 CFR 1910.120). PCD employees and contractors who are assigned emergency response duties for the RCRA permitted hazardous waste management units receive appropriate level training per 29 CFR 1910.120(q) commensurate with their job duties and responsibilities. This training is provided in different levels, such as First Responder Awareness, First Responder Operations, Hazardous Materials Technician, Hazardous Materials Specialist, and On-Scene Incident Commander. The level of training required by the employee who works at the RCRA permitted hazardous waste management units is defined by the PCD Emergency Response Roster. HAZWOPER course descriptions are provided in **Appendix 5-2**.

The levels of First Responder Operations, Hazardous Materials Technician, Hazardous Materials Specialist, and On-Scene Incident Commander training include topics listed under First Responder Awareness Level training along with additional topics and competency demonstration. The regulations in 29 CFR 1910.120(p) are applicable to operations involving hazardous waste that are conducted at treatment, storage, and disposal facilities regulated by 40 CFR or 6 CCR 1007-3, Parts 264 and 265 pursuant to RCRA. This paragraph is applicable to the permitted hazardous waste management units at PCD. However, 29 CFR 1910.120(a)(2)(iii)(c) states that compliance with the requirements of paragraph (q) is deemed to be in compliance with the requirements of (p)(8). PCD follows paragraph (q) instead of paragraph (p) because the need for duplicative training is alleviated, while ensuring adequate employee protection.

5-1c RCRA Training

Facility personnel and contractors who have hazardous waste duties associated with the RCRA permitted hazardous waste management units, along with Installation Response Team (IRT) personnel with responsibilities associated with the permitted units receive classroom education and on-the-job RCRA training to perform their hazardous waste duties. All personnel are trained in the duties and responsibilities relevant to their job position as it relates to hazardous waste operations at the RCRA permitted hazardous waste management units. Course requirements are tailored to the subject areas and levels of detail appropriate for each position associated with the RCRA permitted hazardous waste management units. RCRA course descriptions are located in **Appendix 5-2**.

5-1d Refresher Training

Facility personnel and contractors who have hazardous waste duties for the permitted units are given training on a periodic basis to ensure they remain familiar with the hazards in their work place and requirements related to hazardous material/waste management operations at the RCRA permitted hazardous waste management units. Each time a new physical or chemical hazard is introduced into the work area at the RCRA permitted hazardous waste management units, the supervisor is responsible for ensuring employees are properly trained about that hazard. Employees who work at the RCRA permitted hazardous waste management units receive 8 hours of refresher training annually. Training includes items identified in the HAZWOPER training section. Refresher courses are located in **Appendix 5-2**.

5-1e Job Titles and Duties [6 CCR 1007-3 § 264.16(d)(1) and (d)(2)]

PCD maintains training records at the facility. Required records are as follows: job title for each position at PCD, name of the employee filling each position, a written job description for each position that must include requisite skill, education, or other qualifications, and duties of personnel assigned to each position, written description of type and amount of initial and refresher training, and documentation that training has occurred according to schedule provided in Attachment 5.

Job classifications of PCD personnel are provided in **Appendix 5-1**.

5-1f Training Director [6 CCR 1007-3 § 264.16(a)(2)]

PCD training for personnel who work at or otherwise manage hazardous waste at the RCRA permitted hazardous waste management units is overseen by the PCD Training Coordinator in conjunction with the PCD Environmental Management Office (EMO). The PCD Training Office maintains a personnel training database for personnel who manage hazardous waste operations at the PCD RCRA permitted hazardous waste management units. The EMO provides guidance and oversight to ensure compliance with this Permit. The EMO provides input on training requirements, reviews training records, and advises on any necessary changes.

The PCD Training Coordinator, in conjunction with the PCD EMO, is knowledgeable in training principles and practices, all aspects of the PCD RCRA permitted hazardous waste management units, and knowledgeable and experienced in hazardous waste management. The Training Office and EMO work together to ensure all employees are properly trained. Representatives from the Training Office and EMO evaluate training records. Employee job descriptions and training records are available for evaluation. After evaluation, the EMO identifies any required actions.

Training Records

The Training Office maintains detailed information on employees' training and job information. The official training files are updated and managed by the Training Office and personnel files are updated and managed by the PCD Training Officer. Information maintained by the Training Office includes the following:

- Employee Information – name and date of employment

- Job Information – job title, job description, and hazardous materials or waste management responsibilities and information as specified in Section 5-1e.
- Training Information – entire employee training record.

The responsibilities of the Training Coordinator, in conjunction with the EMO are as follows:

- Ensure personnel are properly trained in the safe management of the PCD permitted units in accordance with Federal, State, Army, and local environmental regulations, including the PCD RCRA Permit.
- Coordinate continuing training as necessary to inform PCD site personnel who work at the RCRA permitted hazardous waste management units of new procedures, provide refresher training, and provide training for new personnel.
- Identify and review vendors and other training resources to meet training requirements.
- Maintain training records in accordance with 6 CCR 1007-3 § 264.16(d) and (e).
- Ensure PCD personnel who work at the permitted hazardous waste management units are trained in hazardous waste management and Contingency Plan implementation, including emergency procedures.
- Ensure PCD personnel who work at or otherwise manage hazardous waste at the permitted hazardous waste management units receive training appropriate to their positions.

In accordance with 6 CCR 1007-3, Part 264.16(d), PCD maintains training records at the PCD Training Office. Required records for personnel who work at the RCRA permitted hazardous waste management units are as follows: job title for each position at PCD, name of the employee filling each position, a written job description for each position, amount of initial and refresher training, documentation that training has occurred, and information as specified in Section 5-1e. Personnel information, such as job descriptions and training information, is maintained in the Training Office files. The EMO reviews these records annually.

Training records for PCD site personnel are maintained, readily available, and include, at a minimum:

- Job title for each position that is related to PCD hazardous waste management operations and activities at the RCRA permitted hazardous waste management units, and the name of each employee filling the position
- Job description specifying duties for each position, minimum qualification required to fill the position, and required training for the position for personnel who work at or otherwise manage hazardous waste at the RCRA permitted hazardous waste management units
- Description of the type and amount of introductory and continuing training that is given to each employee who works at or otherwise manages hazardous waste at the RCRA permitted hazardous waste management units
- Date each employee started working at or otherwise managing hazardous waste at the PCD RCRA permitted hazardous waste management units and termination date
- Course enrollment, attendance, and successful completion information
- Copies of course materials and instructional methods (outlines, schedules, instructional techniques, and materials).

All training records and documentation on current PCD personnel who work at the RCRA permitted hazardous waste management units are kept until closure of the PCD RCRA permitted hazardous waste management units. Training records on former PCD site personnel who worked at the RCRA permitted hazardous waste management units are kept for at least 3 years from the date last worked at the respective site.

Training Staff

All instructors are knowledgeable in the areas in which they are teaching. Subject matter experts (SMEs) are used as they possess the knowledge, training, and experience in a subject content area.

5-1g Relevance of Training to Job Position [6 CCR 1007-3 § 264.16(a)(2)]

All PCD personnel who work at or otherwise manage hazardous waste at the RCRA permitted hazardous waste management units are required to be trained in HAZCOM, HAZWOPER, RCRA training, and Refresher training, as well as in the duties and responsibilities relevant to their job position as it relates to hazardous waste operations at the RCRA permitted hazardous waste management units. Course requirements are tailored to the subject areas and levels of detail appropriate for each position (**Table 5-1**).

5-1h Training for Emergency Response [6 CCR 1007-3 § 264.16(a)(3)]

Emergency response training, relevant to individual positions, is provided to all PCD site personnel who work at the RCRA permitted hazardous waste management units. At a minimum, the training ensures site personnel can respond effectively to emergencies by becoming familiar with site emergency procedures, equipment, and systems, including the following:

- Procedures for locating, using, inspecting, repairing, and replacing site emergency and monitoring equipment
- Location and use of communications and alarm systems
- Response to fires, explosions, or other releases
- Who to inform in the event of an emergency
- Response to groundwater contamination incidents
- Shutdown of operations and evacuation.

Course descriptions are provided in **Appendix 5-2**.

5-2 TRAINING IMPLEMENTATION [6 CCR 1007-3 § 264.16(a)(1), (b), (d)(4), and (e)]

PCD site personnel who work at or otherwise manage hazardous waste at the RCRA permitted hazardous waste management units are required to complete training specific to their job position within 6 months of assignment at their respective sites or to a new assignment at or associated with the RCRA permitted hazardous waste management units and do not work unsupervised until all relevant training has been successfully completed and documented. Furthermore, PCD site personnel who work at or otherwise manage hazardous waste at the RCRA permitted hazardous waste management units must complete the requisite classroom and on-the-job training prior to engaging in any hazardous waste operations.

All training is based on analyses that identify the specific tasks performed by each job position, as well as identify the knowledge, skills, and attitudes required to perform those tasks. Each training course has learning objectives based on analysis of the tasks required to manage waste at the permitted hazardous waste management units. Special emphasis is placed on personnel safety and environmental compliance in every training module. Training aids, such as handouts, reference materials, models, or actual pieces of equipment, are used as appropriate. Specialized vendor or commercially provided training may be required in some areas.

Written test and/or practical demonstration of skills (includes hands-on) is administered during all courses to test the students' mastery of learning objectives to established job performance standards. Certificates of completion are issued to all students who demonstrate proficiency of the course materials. At this point, the student is considered qualified and may work under supervision. Individual employee training is documented after completion of each course.

Hands-on training of the RCRA permitted hazardous waste management units is administered to test a student's mastery of operations while being observed by a supervisor. When the supervisor has determined that the student has met all training requirements, the certifying official certifies the student, who is then able to perform PCD waste management at the RCRA permitted hazardous waste management units (as applicable) unsupervised.

General course descriptions are contained in **Appendix 5-2**.

Table 5-1. PCD Emergency Response Personnel Job Titles, Duties, and Training

Emergency Response Job Title	Duties	Required Hazardous Waste Training
Initial Response Force Commander (IRFC)/ On-Scene Coordinator (OSC)	Responsible for coordinating all operations at the accident site.	<ul style="list-style-type: none"> • HAZCOM • Coast Guard On-Scene Coordinator
Deputy On-Scene Coordinator (DOSC)	The IRFC/OSC will be assisted by the DOSC. The DOSC works directly with civilian authorities and serves as the link between the OSC and civilian authorities.	<ul style="list-style-type: none"> • HAZCOM • Coast Guard On-Scene Coordinator
Deputy Initial Response Force Commander (DIRFC)	This function is performed by the Deputy Commander. The DIRFC is second in command and directly responsible for operations and support under the direction of the IRFC. Primary interface is with higher headquarters and with outside agencies not on-site.	<ul style="list-style-type: none"> • HAZCOM • Coast Guard On-Scene Coordinator
Safety Officer	Issues both general and chemical safety guidance to pertinent IRF personnel and provides safety reports to higher headquarters. Provides general safety guidance and chemical safety guidance for all operating equipment and procedures; also prescribes required protective clothing.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
Quality Assurance Specialist (Ammunition Surveillance) (QASAS)	Submits written Chemical Event Report via Chemical Biological Event Reporting System (CBERS) within 24 hours.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
Public Affairs Officer (PAO)	Serves as personal adviser to the IRFC on all public affairs matters. Also apprises the IRFC on Joint Information Center (JIC) activities.	<ul style="list-style-type: none"> • HAZCOM
PCAPP Liaison Officer	Helps to provide coordination between the depot and PCAPP for any assistance requested from PCAPP to support chemical event operations on the installation. Provides status of PCAPP workforce as it relates to accountability and evacuation of the PCAPP site.	
Surety Officer	Technical advisor to the IRF Commander advising him and the staff on all Chemical Surety matters.	<ul style="list-style-type: none"> • HAZCOM
Operations Section Chief	During a chemical event, the Director of Plans, Training, Mobility and Security or his/her designated representative will function as the Operations Section Chief, who will be responsible for the management of all operations directly applicable to the primary mission. In the absence of the Chief, the Operations Officer will assume his or her responsibilities.	<ul style="list-style-type: none"> • HAZCOM

Table 5-1. PCD Emergency Response Personnel Job Titles, Duties, and Training (Continued)

Emergency Response Job Title	Duties	Required Hazardous Waste Training
On-Scene Incident Commander (OSIC)	During a chemical event or any event not security related, the Installation Fire Chief or his/her designated representative will function as the Incident Commander. Will establish field command post and oversee all operations/activities being performed at the accident site (in the field) and ensure that the Operations Section Chief is apprised of activities in the field. As all field responses must be tailored to the specific conditions of the chemical event, teams employed to respond to the chemical event are also tailored based on the situation.	<ul style="list-style-type: none"> • HAZCOM • RCRA
Field Surety Officer	Reports to the Incident Commander and observes the actions of emergency responders and the Personnel Decontamination Station (PDS) and Decontamination Teams to ensure surety regulatory compliance.	<ul style="list-style-type: none"> • HAZCOM
Field Safety Officer	Reports to the Incident Commander and observes the actions of emergency responders to ensure safety regulatory compliance.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
Hotline Coordinator	Controls operations at the chemical event site until arrival of the OSIC, at which time the Hotline Coordinator will brief the Incident Commander who then assumes control of the event. At that time, the Hotline Coordinator will assume oversight of hotline operations at the chemical event site. The on-scene Supervisory Firefighter or Senior Firefighter on-site will function as the coordinator.	<ul style="list-style-type: none"> • HAZCOM • RCRA
Medical Response Team	Manages the treatment of injured personnel and the respectful handling of human remains.	
PDS Team	Establishes the PDS used to decontaminate personnel contaminated during emergency response operations at the chemical event site.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
Decon Team	Applies decontaminating solution to contaminated equipment, buildings, igloos, munitions, dunnage/packaging, and soil. Establishes a hot line with a contamination reduction area. Employs contamination control teams to control spreading of contamination, assesses chemical event scene and provides information to Incident Commander and Operations Section Chief on status of chemical event site.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
Security Team	Provides security oversight of the chemical event, the team will be supervisor under the OSIC by the senior security patrol person located in the Chemical Limited Area (CLA) (i.e. CPT, LT, SGT, etc...) that will co-locate in the area of the OSIC along with a separate team member functioning as a barrel guard.	<ul style="list-style-type: none"> • HAZCOM
OSIC Recorder	Records and provides a written detail of all events and actions that take place at the Field Command Post at the direction of the Incident Commander.	<ul style="list-style-type: none"> • HAZCOM

Table 5-1. PCD Emergency Response Personnel Job Titles, Duties, and Training (Continued)

Emergency Response Job Title	Duties	Required Hazardous Waste Training
Operations Officer	During a chemical event or any event requiring activation of the Operations Center (OC), the Chief, Plans and Operations Branch or his designated representative will function as the Operations Officer. The Operations Officer will oversee overall management of OC operations and ensure that all emergency response duty positions are filled. Will ensure regular update briefings that all OC Cadre personnel are kept current of the status of the chemical event.	<ul style="list-style-type: none"> • HAZCOM
Off-Post Liaison	During a chemical event, relocates to the County Emergency Operations Center (EOC) where he/she serves as the contact for assisting and/or cooperating agency responsibilities with the various organizations responding to the event.	<ul style="list-style-type: none"> • HAZCOM
Security Representative	Through the on-site security team, monitors and directs security operations to ensure security of the chemical event site and surety material.	<ul style="list-style-type: none"> • HAZCOM
Radio Net Recorder Team	Transcribes all information broadcast over depot radios during a chemical event response.	<ul style="list-style-type: none"> • HAZCOM
Monitoring Coordinator	Serves as the point of contact for all monitoring operations at the chemical event site. Directs monitoring teams in support of the Incident Commander, analyzing potential downwind hazards.	<ul style="list-style-type: none"> • HAZCOM • HAZWOPER • RCRA
OC Graphics Analyst	Ensures that the wall-mounted visual status board is updated with current event information for display to the entire OC.	<ul style="list-style-type: none"> • HAZCOM

Appendix 5-1
PCD JOB TITLES AND DESCRIPTIONS
FOR
EMPLOYEES WHO WORK AT THE PCD RCRA PERMITTED
HAZARDOUS WASTE MANAGEMENT UNITS

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Appendix 5-1

**PCD JOB CLASSIFICATIONS FOR EMPLOYEES WHO WORK AT THE
PCD RCRA PERMITTED HAZARDOUS WASTE MANAGEMENT UNITS**

Job classifications and descriptions presented in this attachment pertain to personnel who may work at or otherwise manage hazardous waste at the PCD RCRA permitted hazardous waste management units.

Waste Generators – Personnel classified as waste generators typically perform activities that involve the following:

- Generating RCRA regulated hazardous waste
- Packaging, containerizing, or labeling RCRA regulated hazardous waste
- Accumulating RCRA regulated hazardous waste
- Performing maintenance activities within a RCRA regulated hazardous waste management unit
- Supervising personnel who conduct the activities listed above.

Waste Managers – Employees classified as waste management personnel typically:

- Perform RCRA unit inspections
- Manage RCRA regulated hazardous waste in RCRA permitted storage areas
- Receive RCRA regulated hazardous waste from another RCRA unit into their area of responsibility
- Supervise personnel who conduct the activities listed above.

Emergency Response Personnel – Employees classified as emergency response personnel are emergency responders who generate, or supervise personnel who generate, waste during an emergency

1 response. Emergency response personnel may also respond to emergencies involving hazardous waste.
2 The majority of the emergency responders are trained in accordance with one or more of the other
3 classifications. Employees classified as emergency personnel are those who:

- 4
- 5 • Respond to emergencies in accordance with PCD emergency response procedures and the
- 6 RCRA Contingency Plan
- 7
- 8 • May generate and manage hazardous waste during hazardous response activities
- 9
- 10 • Supervise personnel who conduct the activities listed above.
- 11

12 **Environmental/Waste SMEs** – Personnel classified as environmental/waste SMEs typically provide
13 guidance to the waste generator or waste generating organization on the following:

- 14
- 15 • Hazardous waste determinations and waste analysis requirements
- 16
- 17 • Compliant packaging and management of RCRA regulated hazardous waste in containers
- 18
- 19 • Compliant accumulation, management, and storage of RCRA regulated hazardous wastes
- 20 in RCRA permitted hazardous waste management units
- 21
- 22 • Inspections of hazardous waste management units
- 23
- 24 • Identification and maintenance of proper documentation for RCRA regulated hazardous
- 25 waste management activities
- 26
- 27 • Preparation of modifications to the RCRA permit
- 28
- 29 • Inspections and assessments of RCRA regulated activities at the RCRA hazardous waste
- 30 management units.

APPENDIX 5-2
COURSE DESCRIPTIONS
FOR PERSONNEL WHO WORK AT
THE PCD RCRA PERMITTED HAZARDOUS WASTE MANAGEMENT UNITS

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Appendix 5-2
COURSE DESCRIPTIONS

Training courses provide the most efficient and effective means of accomplishing training for a wide range of job descriptions at the PCD RCRA permitted hazardous waste management units. A description of each training course follows.

HAZCOM Training

This training describes hazardous chemicals and situations at the RCRA permitted hazardous waste management units and covers the following topics:

- Methods and observations used to detect the presence or release of a hazardous chemical in the work area
- Physical and health hazards of chemicals in the work area
- Measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals such as appropriate work practices, emergency procedures, and personal protective equipment (PPE) to be used
- Details of the hazard communication program, including an explanation of the labeling system, chemical inventory procedures, Material Safety Data Sheets, and where they are located in the work place.

HAZWOPER Training

This training provides information on the following topics:

- HAZWOPER in accordance with 29 CFR 1910.120 (e):
 - Names of personnel and alternates responsible for site safety and health

- 1 – Safety, health, and other hazards present on the site
- 2
- 3 – Use of PPE
- 4
- 5 – Work practices by which the employee can minimize risks from hazards
- 6
- 7 – Safe use of engineering controls and equipment onsite
- 8
- 9 – Medical surveillance requirements, including recognition of symptoms and signs
- 10 that might indicate overexposure to hazards
- 11
- 12 – Decontamination procedures
- 13
- 14 – Emergency response plan, including PPE and other equipment
- 15
- 16 – Confined space entry requirements
- 17
- 18 – Spill containment program.
- 19
- 20 • HAZWOPER in accordance with 29 CFR 1910.120 (q)(6)(i) First Responder Awareness
- 21 Level:
- 22
- 23 – U.S. Department of Transportation (DOT) *Emergency Response Guidebook*
- 24
- 25 – Hazardous substance identification and risks
- 26
- 27 – Hazardous waste management procedures
- 28
- 29 – Emergency notification without attempting to contain or stop the release
- 30
- 31 – Ability to identify the need for additional resources and make appropriate
- 32 notifications
- 33
- 34 – Job-specific responsibilities.

- HAZWOPER First Responder Operations Level in accordance with 29 CFR 1910.120 (q)(6)(ii), which includes the requirements listed for the First Responder Awareness Level and the addition of the following:
 - Hazardous substance identification and risks
 - Hazardous waste management procedures
 - Emergency response by trying to contain without attempting to stop the release
 - Ability to identify the need for additional resources and make appropriate notifications
 - Job-specific responsibilities
 - Basic hazard assessment techniques
 - Use of PPE
 - Basic hazardous terms
 - Basic decontamination procedures
 - Relevant standard operating and termination procedures.
- HAZWOPER Hazardous Materials Technician Level in accordance with 29 CFR 1910.120 (q)(6)(iii), which includes the requirements listed for the First Responder Operations Level and the addition of the following:
 - Emergency response trying to contain and attempting to stop the release
 - PCD Emergency Response Plan (PCD 2002), including site security and control
 - Use of field survey instruments and equipment to identify unknown and known chemicals

- Function within an assigned role in the Incident Command System (PCD 2002)
- Use of specialized PPE
- Hazard and risk assessment techniques
- Advance control, containment, and/or confinement operations
- Implementation of decontamination procedures
- Termination procedures
- Basic chemical and toxicological terminology and behavior.
- HAZWOPER Hazardous Materials Specialist Level in accordance with 29 CFR 1910.120 (q)(6)(iv), which includes the requirements listed for the Hazardous Materials Technician Level and the addition of the following:
 - Implementation of the PCD Emergency Response Plan (PCD 2002)
 - Use of advanced survey instruments and equipment to identify unknown and known chemicals
 - Selection and use of proper specialized chemical PPE
 - In-depth hazard and risk techniques
 - Specialized control, containment, and/or confinement operations
 - Determination and implementation of decontamination procedures
 - Development of a site safety and control plan
 - Understanding of chemical, radiological, and toxicological terminology and behavior.

RCRA Training Course

The RCRA training provides information on the following topics:

- RCRA requirements, PCD Hazardous Waste RCRA Permit, documents, recordkeeping, waste management, etc.
- Emergency and monitoring equipment procedures for the RCRA permitted hazardous waste management units
- Communications and alarms systems
- Contingency measures response procedures (for example, response to fires, explosions, groundwater contamination).

Annual Refresher Training:

Employees are given training on a periodic basis to ensure they remain familiar with the hazards in their workplace and the requirements related to hazardous waste management operations, including the following:

- Changes to the RCRA Permit that affect operating practices
- Changes to waste management procedures
- Lessons learned pertaining to the generation, accumulation, storage, and treatment of hazardous waste.
- Lessons learned pertaining to spills and releases.

